

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CRYSTAL MARIE HAWORTH,

Defendant.

Case No. 21-cr-00207

Hon. David Cleveland Joseph

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**DEFENDANT'S UNOPPOSED MOTION TO CONTINUE DEADLINES**

Defendant Crystal Marie Haworth, by her counsel, moves to continue various pretrial deadlines. She is not seeking to continue the trial date, which is currently set for March 6, 2023. Currently, motions and notices are due by January 5, 2023; motions in limine and responses are due by January 17, 2023; foreseeable issues, jury instructions, voir dire, and trial briefs are due by February 3, 2023; and the plea deadline is February 10, 2023. (Dkt. #53) Counsel seek a 14-day continuance of the motions deadlines to facilitate resolution of this case. The Government has no objection to continuing the motions deadlines.

On December 28, 2022, counsel for both parties spoke by phone to discuss a resolution. The government counsel extended a verbal offer but has not yet drafted the agreement and obtained supervisor approval. Defense counsel discussed the proposal with Ms. Haworth on December 29, 2022; however, reviewing the written

offer will require travel to Oklahoma to review the written agreement in person. Counsel strongly believe an in-person meeting to review the document is essential to ensure Ms. Haworth can make an informed choice about how to proceed because of her psychiatric history and cognitive impairments. Counsel has scheduled a trip to see Ms. Haworth, leaving on January 5, 2023, and returning on January 7, 2023.

An adjournment of the motions deadlines will facilitate plea negotiations by allowing the parties to focus on the proposed resolution and conserving resources. Although defense counsel does not anticipate filing pretrial motions, this case would involve expert testimony, and defense counsel has already informally provided the government with information about the anticipated experts and their opinions. In light of the foregoing, proceeding with the current motions deadlines would prejudice Ms. Haworth.

### **CONCLUSION**

Ms. Haworth requests that the Court extend the motions deadline by 14 days and adjust all other deadlines as the Court deems appropriate.

Date: January 3, 2023

Respectfully submitted,

**FEDERAL PUBLIC DEFENDER  
WESTERN DISTRICT OF WASHINGTON**

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 3, 2023, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system, which will send notification to opposing counsel.

Respectfully Submitted,

**FEDERAL PUBLIC DEFENDER  
WESTERN DISTRICT OF WASHINGTON**

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